REMARKS

Claims 1-14, 16, 18-22, 37 and 38 are pending in the application. The Examiner is respectfully requested to reconsider and withdraw the rejections in view of the amendments and remarks herein.

Claim Rejections – 35 U.S.C. § 101

Claims 1-14, 16 and 18-22 stand rejected under 35 U.S.C. § 101 as allegedly being directed to non-statutory subject matter. This rejection is respectfully traversed.

Claim 1, as amended herein, includes the features of storing a first private workflow and a second private workflow in a computer-readable storage medium, and accessing the first and second private workflows from the computer-readable storage medium. Consequently claim 1, as well as claims 2-14, 16 and 18-22, which ultimately depend therefrom, are tied to a statutory class. Therefore, reconsideration and withdrawal of the rejection are respectfully requested.

Claim Rejections – 35 U.S.C. § 103

Claims 1-14, 16, 18-22, 37 and 38 were rejected under 35 U.S.C. § 102(b) over U.S. Patent No. 6,041,306 ("Du") in view of Wil M. P. van der Aalst, "Process-Oriented Architectures for Electronic Commerce and Interorganizational Workflow," Information Systems, Vol. 24, No. 8, pp. 639-71 (1999) ("Aalst"). This rejection is respectfully traversed.

As discussed in Applicants' previous response, each of claims 1, 37 and 38, as previously presented, defines over the asserted references. However, and in an effort to advance prosecution of the instant application, each of claims 1, 37 and 38 has been amended herein to include the features of defining first state dependencies between the first plurality of actual tasks of the first private workflow and the first abstracted view, and second state dependencies between the second plurality of actual tasks of the second private workflow and the second abstracted view, the first and second state dependencies assuring that the respective first and second abstracted views accurately represent states of the corresponding first and second pluralities of actual tasks, and defining control flow dependencies between the first abstracted view and the second abstracted view, the first and second control flow dependencies expressing

interaction of the first and second private workflows. In short, the features of each of claims 1, 37 and 38 account for the nested behavior and interdependencies of abstract process steps and their implementation by actual tasks in a workflow management system. These interdependencies are preserved, while selectively hiding process steps in the abstracted views for confidentiality and security purposes.

As discussed in further detail below, Du and Aalst, either alone or in combination, fail to disclose or render obvious at least the above-identified features of each of claims 1, 37 and 38.

Du is provides a WFPM system 10 that executes at least one workflow process (WFP) 18 that includes a sequence of activities, each of which is performed by one or more computer systems 12a-d, and/or a microprocessor controlled device 16 of the WFPM system 10 (see Fig. 1, and col. 4, lines 34-44). The WFP 18 is represented as a directed graph 40 consisting of work nodes 41, 43, 45, 46, 48, 50, 52, 54, and rule nodes 42, 44, 47, 49, 51, 53, 55. Work nodes 41, 43, 45, 46, 48, 50, 52, 54 represent activities to be performed external to an HP OpenPM engine 20, and rule nodes 42, 44, 47, 49, 51, 53, 55 represent processing internal to the HP OpenPM engine 20 (see Fig. 3, and col. 6, lines 12-48). Du provides process design modules 22a-c that specify the WFP 18. Du, however, is silent as to the manner in which the process design modules 22a-c specify the WFP 18. Instead, Du focuses on the runtime aspects of the WFP 18. More specifically, Du provides that the users 14a-b, machines 15a-b, or microprocessor-controlled device 16 execute the WPF 18 (see col. 4, lines 51-56).

Du fails to disclose the feature of defining first state dependencies between the first plurality of actual tasks of the first private workflow and the first abstracted view, and second state dependencies between the second plurality of actual tasks of the second private workflow and the second abstracted view, the first and second state dependencies assuring that the respective first and second abstracted views accurately represent states of the corresponding first and second pluralities of actual tasks. Instead, as noted above, Du focuses on the runtime aspects of the WFP 18, and does not discuss any type of dependencies between a tasks WFP 18, and an abstracted view of the WFP 18 (as discussed in further detail below, Du fails to disclose abstraction of the WFP 18), much less state dependencies to assure that the abstracted view accurately represent states of the corresponding WFP 18.

Du also fails to disclose the feature of defining control flow dependencies between the first abstracted view and the second abstracted view, the first and second control flow dependencies expressing interaction of the first and second private workflows. As discussed in further detail below, Du fails to disclose abstraction of the WFP 18. Even if Du did disclose such an abstraction, Du does not discuss any type of dependencies between different abstracted view of the WFP 18, much less control flow dependencies expressing interaction of the different WFPs 18.

In making the instant rejection, the Examiner has cited the WFP 18 of Du as a first private workflow, and another WFP 18 as a second private workflow, and has identified the users 14a-b as both first and second parties (see instant Office action, p. 5). Each WFP 18, however, is common to both users 14a-b. Consequently, the WFP 18 cannot be considered as being private to either user 14a-b. The Examiner also suggests the WFP 18 as providing a "superstructure" of multiple activities potentially performed in parallel (see instant Office action, p. 5). An accurate reading of Du, however, provides that the WFPM system 10 acts as a "superstructure" that ties disparate computer systems 12a-d (see col. 4, lines 47-51).

The Examiner has cited col. 8, lines 22-59 of Du as disclosing the feature of abstracting the first and second workflows, identified as WPFs 18, to provide respective first and second abstracted views. An accurate reading of Du, however, reveals no such disclosure of abstracting. More specifically, col. 8, lines 22-59 of Du relate to the Common Object Requesting Broker Architecture (CORBA), which is a standard defined by the Object Management Group (OMG) that enables software components written in multiple computer languages and running on multiple computers to work together. The abstraction of a private workflow process to provide a corresponding abstracted view is not disclosed in the cited passage.

Aalst is generally directed to very high-level, cross-organizational business processes, and does not relate to abstracting private workflows. Further, Aalst is not asserted as disclosing, nor does Aalst disclose the above-identified features of each of claims 1, 37 and 38. Consequently, Aalst cannot cure the deficient disclosure of Du.

In summary, neither Du nor Aalst disclose abstract private workflow processes, taking details away so that partners can interact using a simplified, abstracted process without being aware of the details of the private workflow processes. Further, neither Du nor Aalst accounts

for the nested behavior and interdependencies of abstract process steps and their implementation by actual tasks in a workflow management system, much less preserving such interdependencies, while selectively hiding process steps in the abstracted views for confidentiality and security purposes. As discussed above, Du focuses on the runtime aspect of a workflow process, and Aalst provides very high-level, cross-organizational business processes.

In view of the foregoing, neither Du nor Aalst, taken alone or in combination, disclose or render obvious the features of each of claims 1, 37 and 38. Therefore, reconsideration and withdrawal of the rejections are respectfully requested.

Each of claims 2-14, 16, 18-22 ultimately depends from claim 1, which defines over the asserted reference for the reasons discussed above. Consequently, each of claims 2-14, 16, 18-22 also define over the asserted reference for at least the same reasons. Therefore, reconsideration and withdrawal of the rejections are respectfully requested.

CONCLUSION

It is believed that all of the pending claims have been addressed. However, the absence of a reply to a specific rejection, issue or comment does not signify agreement with or concession of that rejection, issue or comment. In addition, because the arguments made above may not be exhaustive, there may be reason for patentability of any or all pending claims (or other claims) that have not been expressed. Finally, nothing in this paper should be construed as an intent to concede any issue with regard to any claim, except as specifically stated in this paper, and the amendment of any claim does not necessarily signify concession of unpatentability of the claim prior to amendment. Applicants respectfully request consideration of all filed IDS' not previously considered, by initialing and returning each Form 1449.

The undersigned attorney welcomes the opportunity to further discuss by telephone any position or issue not fully addressed by the above remarks and amendments.

No charges are believed due. However, if any fees are due, they are being paid concurrently herewith on the Electronic Filing System (EFS) by way of Deposit Account authorization. Please apply all charges or credits to Deposit Account No. 06-1050, referencing Attorney Docket No. 13909-0026003.

Respectfully submitted,

Date: May 6, 2009

Ryan McCarthy
Reg. No. 50,636

Customer No. 32864
Fish & Richardson P.C.
Telephone: (512) 472-5070
Facsimile: (877) 769-7945